

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	
RONALD LARRY LOCY,)	Criminal No. 16-240
)	
Defendant.)	Electronically Filed

MOTION TO TERMINATE RESTITUTION OBLIGATION

AND NOW comes Defendant, Ronald Larry Locy, by and through his attorney, Martin A. Dietz, Esquire, and respectfully moves this Court to terminate the restitution obligation in this case on the following basis:

1. Defendant, Ronald Larry Locy, (hereinafter “Mr. Locy”) had been charged in this case through the filing of a negotiated Information charging him with a violation of 18 U.S.C. §§669 and 2.

2. Mr. Locy negotiated a plea agreement with the government entered a plea of guilty in this case on January 20, 2017.

3. On February 21, 2018, Mr. Locy was sentenced by this Court to a term of imprisonment of 24 months, restitution in the amount of \$846,819.00 and a term of supervised release of three years.

4. As set forth in the sentencing memorandum filed prior to sentencing, Mr. Locy entered into an arms' length agreement with the victim in this case, Zurich American Insurance Company ("Zurich"), to specifically satisfy any outstanding restitution obligation. That agreement had not been fulfilled prior to the time Mr. Locy went to prison.

5. Since his release from imprisonment, however, Mr. Locy has fulfilled his financial obligations to Zurich. As set forth in Exhibit "A" attached hereto, Zurich has confirmed to Mr. Locy, in writing, that his financial obligations to Zurich are fulfilled:

Your satisfaction of the obligation/settlement agreement concludes this matter between yourself and Zurich, the insurer for the original victim and your former employer, University of Pittsburgh Medical Center. Zurich's claim 6380067312 is now closed.

6. Mr. Locy has honored his obligation to Zurich, the only victim identified in the restitution order and Zurich acknowledges that Mr. Locy owes it no more money.

7. Due to the unique and extraordinary circumstances of this case, Mr. Locy respectfully requests that this Court enter an order declaring that Mr. Locy's restitution obligation in this case is satisfied and complete.

8. Assistant United States Attorney Robert Cessar does not object to the Court's granting the relief requested herein.

WHEREFORE, for the reasons set forth above, Defendant, Ronald Locy, respectfully requests that the Court enter an order declaring that his restitution obligation is satisfied.

Respectfully submitted,

s/ Martin A. Dietz.
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